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Filed 09/14/2009

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PLEASE TAKE NOTICE that institutional investor IBEW Local 351 Welfare, Pension and Annuity Funds ("IBEW Local 351") hereby moves this for an Order: (i) appointing IBEW Local 351 as Lead Plaintiff; (ii) approving IBEW Local 351's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Lovell Mitchell & Barth, LLP to serve as Liaison Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, IBEW Local 351 submits herewith a Memorandum of Law and Declaration of Karl P. Barth, dated September 14, 2009.

PLEASE ALSO TAKE NOTICE that a telephonic hearing on this motion is scheduled for October 22, 2009 at 1:30 p.m. at the Court's local time. Parties should use the Court's conference line at (509) 372-1234.

DATED: September 14, 2009

## LOVELL MITCHELL & BARTH, LLP

## s/ Karl P. Barth

Karl P. Barth, WSBA #22780 911 Western Ave., Suite 308 Seattle, WA 98104 Telephone: 206/432-8330 206/432-8331 (fax)

[Proposed] Liaison Counsel

NOTICE OF MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL (CV-09-00214-JLQ) Lovell Mitchell & Barth, LLP 911 Western Ave., Suite 308, Seattle, WA 98104 Telephone: 206/432-8330 • Fax: 206/432-8331

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14	Additional Counsel for Plaintiff
15	Additional Counsel for Flamini
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